

BellSouth Telecommunications, Inc. 615 214-6301
Suite 2101 Fax 615 214-7406
333 Commerce Street
Nashville, Tennessee 37201-3300

REC'D TN
REGULATORY AUTH.
BELL SOUTH

'89 AUG 16 PM 2 25
Guy M. Hicks
General Counsel

August 16, 1999

EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Proceeding for the Purpose of Addressing Competitive Effects of Contract Service Arrangements Filed by BellSouth Telecommunications, Inc. in Tennessee*
Docket No. 98-00559

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the affidavit BellSouth agreed to file during the prehearing conference last week. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

REC'D TN
REGULATORY AUTH.**BEFORE THE TENNESSEE REGULATORY AUTHORITY**
Nashville, Tennessee

99 AUG 16 PM 2 25

In Re: *Proceeding for the Purpose of Addressing Competitive Effects of Contract Service Arrangements Filed by BellSouth Telecommunications, Inc. in Tennessee*
Docket No. 98-00559

AFFIDAVIT OF LARRY M. SMITH

STATE OF GEORGIA)

COUNTY OF FULTON)

LARRY M. SMITH, being first duly sworn, deposes on oath and says:

1. My name is Larry M. Smith, and I am employed by BellSouth Business Systems as a Senior Director.

2. During the course of these and related proceedings, BellSouth has produced certain documents which it has stamped as proprietary or has otherwise designated as proprietary, and such documents constitute CONFIDENTIAL INFORMATION pursuant to the terms of the Protective Order entered in this proceeding.

3. Each of these documents contain one or more categories of proprietary information, including but not limited to those categories described in "BellSouth's Response to Hearing Officer's Request Regarding Proprietary Documents" which was filed in this docket on August 13, 1999.

4. BellSouth takes appropriate measures to protect and preserve the proprietary nature of documents containing these categories of information.

5. Among the parties to this proceeding are telecommunications companies that compete with BellSouth in the local exchange market in Tennessee.

6. Unless the documents described in this affidavit are treated as CONFIDENTIAL INFORMATION pursuant to the protective order entered in this docket, BellSouth's competitors obtain competitively sensitive information contained in the documents, thereby gaining an unfair competitive advantage over BellSouth.

FURTHER AFFIANT SAITH NOT.

Larry M. Smith 8-16-99
LARRY M. SMITH

Sworn to and subscribed before me, this 16 day of August, 1999.

Dale E. Spain
Notary Public

My Commission Expires:

June 25, 2001

Notary Public, Georgia, County of Gwinnett
My Commission Expires June 25, 2001

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

☒ Hand
☐ Mail
☐ Facsimile
☐ Overnight

Richard Collier, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0500

☒ Hand
☐ Mail
☐ Facsimile
☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
414 Union Ave., #1600
P. O. Box 198062
Nashville, TN 39219-8062

☒ Hand
☐ Mail
☐ Facsimile
☐ Overnight

Jon Hastings, Esquire
Boult, Cummings, et al.
414 Union St., #1600
Nashville, TN 37219

☒ Hand
☐ Mail
☐ Facsimile
☐ Overnight

Charles B. Welch, Esquire
Farris, Mathews, et al.
511 Union St., #2400
Nashville, TN 37219

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

James Lamoureux, Esquire
AT&T
1200 Peachtree St., NE
Atlanta, GA 30309

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☐ Mail
☐ Facsimile
☐ Overnight

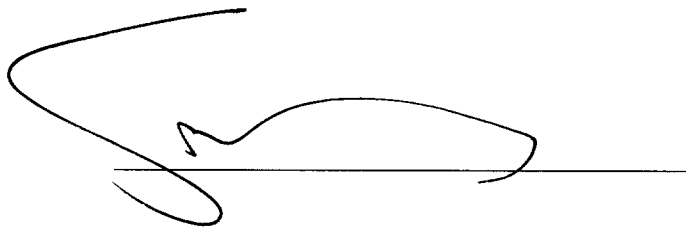
Vance Broemel, Esquire
Consumer Advocate Division
426 5th Avenue, N., 2nd Floor
Nashville, TN 37243

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Carolyn Tatum Roddy, Esquire
Sprint Communications Co., L.P.
3100 Cumberland Circle, N0802
Atlanta, GA 30339

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Val Sanford, Esquire
Gullett, Sanford, et al.
230 4th Ave., N., 3rd Fl.
P. O. Box 198888
Nashville, TN 37219-8888

A handwritten signature in black ink, appearing to read "Val Sanford", is written over a horizontal line.